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February 18, 2011

**Via ECF**

Hon. Michael A. Shipp, U.S.M.J.  
District of New Jersey  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

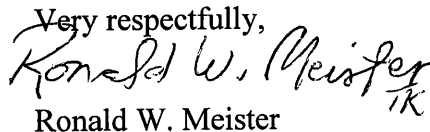
Re: Renaissance Carpet and Tapestries, Inc. v. S&H Rugs et ano.  
Civil Action No. 09 -CV- 00632 (SRC-MAS)

Dear Judge Shipp:

This firm represents plaintiff in the above-entitled matter, in which defendants have requested an extension of their time to serve and file papers in opposition to plaintiff's Motion for Sanctions for Spoliation of Evidence. Defendants request an extension of the current due date, March 3, 2011, to April 4, 2011, and that the motion be carried two motion cycles, to April 18, 2011.

Defendants' counsel states that we "declined [their] request for a 30-days adjournment of the return date." Counsel neglects to mention that we offered our consent to an adjournment of the motion date to April 4, with defendants' responsive papers to be filed and served by March 14, with plaintiff's reply to be filed and served by March 25.

The present schedule was set by the Court, adopting all counsel's scheduling requests in a conference call. We believe that a full month's delay is excessive and unwarranted. Accordingly, we reiterate our consent to the extension outlined above, which gives defendants 25 days to file and serve opposition papers, and request that the Court, should it grant defendants' request for an adjournment, set the adjournment on those more reasonable terms.

Very respectfully,  
  
Ronald W. Meister

cc: Jay R. McDaniel, Esq. (via ECF and e-mail)